

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

Stream TV Networks, Inc.,¹

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

In re:

Technovative Media, Inc.,

Debtor.

STREAM TV NETWORKS, INC. and
TECHNOVATIVE MEDIA, INC.,

Plaintiffs,

v.

SHADRON L. STASTNEY, SLS HOLDINGS VI, LLC, HAWK INVESTMENT HOLDINGS LIMITED, ARTHUR LEONARD ROBERT "BOB" MORTON, SEECUBIC, INC., ALASTAIR CRAWFORD, KRZYSZTOF KABACINSKI, KEVIN GOLLOP, ASA GOLA, JOHN DOE(S), JANE DOE(S), DELAWARE and OTHER LAW FIRMS representing and acting in concert with John Doe(s) and/or Jane Doe(s), INVESTMENT BANKS employed by John Doe(s) and/or Jane Doe(s), PATRIC THEUNE, and SEECUBIC B.V.,

Defendants.

Chapter 11

Bky. No. 23-10764 (MDC)

(Jointly Administered)

Adv. No. 23-00057 (MDC)

Re: D.I. 56, 58, 60, 65

**REVISED STIPULATION AND [PROPOSED] ORDER REGARDING DEADLINES
FOR RESPONSES AND REPLIES TO DEFENDANTS' MOTIONS TO DISMISS**

¹ The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (...4092) and Technovative Media, Inc. (...5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

Plaintiffs, Stream TV Networks, Inc. and Technovative Media, Inc. (“Debtors”) and Defendants Hawk Investment Holdings, Ltd., Arthur Leonard Robert “Bob” Morton, SeeCubic, Inc., Shadron L. Stastney and SLS Holdings VI, (“Defendants”), by and through their respective undersigned counsel, enter into this *Revised Stipulation for Responses to Defendants’ Motions to Dismiss* (the “Stipulation”) and hereby stipulate and agree as follows:

1. On August 14, 2023, Debtors filed the above-captioned *Adversary Complaint* [D.I. 1] (the “Adversary Complaint”).
2. On August 14, 2023, a Summons was issued to SeeCubic, Inc., SLS Holdings VI, LLC and Hawk Investment Holdings, Ltd., which set the deadline of September 13, 2023 for Defendants’ to answer or respond to the Adversary Complaint. [D.I. 2]
3. On September 12, 2023, Defendant SeeCubic, Inc. and Debtors filed a first *Stipulation to Extend the Deadline to Respond to the Complaint*. [D.I. 8]
4. On September 13, 2023, Defendant SLS Holdings VI, LLC and Debtors filed a first *Stipulation to Extend the Deadline to Respond to the Complaint*. [D.I. 10]
5. On September 14, 2023, the Court granted the Stipulations to respond to the Adversary Complaint to September 20, 2023. [D.I. 11, 12]
6. On September 18, 2023, Defendant SLS Holdings VI, LLC, Shadron Stastney and SeeCubic Inc. filed a second *Motion to Extend Time to File Answer Pursuant to Rule 9006(b)(1)*. [D.I. 18] On the same day, Defendant Hawk Investment Holdings Ltd. filed its *Joinder to Defendant SLS Holdings VI, LLC, Shadron L. Stastney and SeeCubic Inc.’s Motion*. [D.I. 19]
7. On September 20, 2023, the Court entered an Order granting Defendants’ Motion to Extend Time to file Answer to October 13, 2023. [D.I. 22]

8. On October 10, 2023, Defendant Hawk Investment Holdings Ltd. filed its *Motion to Extend Time to File an Answer Pursuant to Rule 9006(b)(1)*, seeking an extension until November 13, 2023. [D.I. 56]

9. Defendants Hawk Investment Holdings Ltd., SLS Holdings VI, LLC and Shadron L. Stastney and SeeCubic, Inc., filed their respective Joinders to the Motion to Extend Time, [D.I. 58, 60, 62]

10. On October 12, the Court entered its Order Granting Defendants' Motion to Extend Time to File and Answer Pursuant to Rule 9006(b)(1) for all Defendants to November 13, 2023. [D.I. 65]

11. On November 13, 2023, Defendants Shadron L. Stastney, SLS Holdings VI, LLC, Hawk Investment Holdings Ltd. and Arthur Leonard Robert "Bob" Morton and SeeCubic, Inc. filed their Motions to Dismiss the Adversary Complaint with Prejudice, Pursuant to F.R.C.P. 12(b)(6), 12(9)(b), and 12 (8)(a). (the "Motions to Dismiss") [D.I. 85, 89, 91, 92]

12. On December 6, 2023, the Parties filed a Stipulation and [Proposed] Order Regarding Deadlines for Responses and Replies to Defendants' Motions to Dismiss. [D.I. 111]

13. The Parties have conferred further regarding an agreement to establish deadlines for Debtors to respond to the Motions to Dismiss and for Defendants to file a Reply, if desired.

14. The Debtors' deadline to respond to the Motions to Dismiss shall be set for January 12, 2024.

15. The deadline for Defendants to reply shall be set for February 9, 2024.

Dated: December 18, 2023

**LEWIS BRISBOIS
BISGAARD & SMITH, LLP**

/s/ Rafael X. Zahralddin-Aravena

Rafael X. Zahralddin-Aravena (No. 71510)
550 E. Swedesford Road, Suite 270
Wayne, PA 19087
Tel: (302) 985-6000
Email: Rafael.Zahralddin@lewisbrisbois.com

-and-

Keith Kodosky (admitted *pro hac vice*)
600 Peachtree Street NE, Suite 4700
Atlanta, GA 30308
Tel: (404) 991-2183
Email: Keith.Kodosky@lewisbrisbois.com

-and-

Kevin Shaw (admitted *pro hac vice*)
500 Delaware Avenue, Suite 700
Wilmington, Delaware 19801
Tel: (302) 295-9436
Email: Kevin.Shaw@lewisbrisbois.com

Counsel to the Debtors

**SKADDEN ARPS SLATE
MEAGHER & FLOM, LLP**

/s/ Marley Ann Brumme

Joseph O. Larkin (No. 206047)
920 N. King Street, One Rodney Square
Wilmington, DE 19801
Tel: (302) 651-3000
Email: joseph.larkin@skadden.com

Respectfully submitted,

K&L GATES, LLP

/s/ Thomas A. Warns

Steven Caponi. (No. 91881)
Megan E. O'Connor
600 N. King Street, Suite 901
Wilmington, DE 19801
Tel: (302) 416-7080
Email: steven.caponi@klgates.com
megan.oconnor@klgates.com

-and-

Margaret E. Westbrook, Esq. (admitted *pro hac vice*)
Jonathan N. Edel, Esq. (admitted *pro hac vice*)
300 South Tryon St., Suite 1000
Charlotte, NC 28202
Tel: (704) 331-7400
Email: Margaret.Westbrook@klgates.com
Jon.Edel@klgates.com

-and-

Thomas A. Warns (admitted *pro hac vice*)
599 Lexington Avenue
New York, NY 10022
Tel: (212) 536-4009
Email: tom.warns@klgates.com

*Counsel for Hawk Investment Holdings Ltd. and
Arthur Leonard Robert Morton*

BALLARD SPAHR, LLP

/s/ Emilia McKee Vassallo

Tobey M. Daluz (No. 60685)
Terence M. Grugan (No. 307211)
Emilia McKee Vassallo (No. 318428)
Margaret A. Vesper (No. 329793)
1735 Market Street, 51st Floor

-and-

Philadelphia, PA 19103
(215) 864-8320
Email:GruganT@ballardspahr.com

Eben P. Colby, Esq. (admitted *pro hac vice*)

Marley Ann Brumme, Esq. (admitted *pro hac vice*) *Counsel for Shadron L. Stastney*

500 Boylston Street, 23rd Floor

Boston, MA 021116

Tel: (617) 573-4800

Email: Eben.Colby@skadden.com

Marley.Brumme@skadden.com

Counsel for SeeCubic, Inc.

ROBINSON COLE, LLP

/s/ Davis L. Wright

Davis Lee Wright (No. 90926)

Katherine M. Fix (No. 314471)

Ryan M. Messina (No. 329835)

1201 North Market Street

Wilmington, DE 19801

(302) 516-1703

Email: DWright@rc.com

KFix@rc.com

RMessina@rc.com

Counsel for SLS Holdings, VI, LLC

IT IS SO ORDERED:

The Honorable Magdeline D. Coleman
Chief United States Bankruptcy Court